

1 WRIGHT, FINLAY & ZAK, LLP
 2 Raymond Jereza, Esq.
 3 Nevada Bar No. 011823
 4 5532 South Fort Apache Road, Suite 110
 5 Las Vegas, NV 89148
 6 (702) 475-7964; Fax: (702) 946-1345
 7 rjereza@wrightlegal.net
 8 *Attorney for Secured Creditor, Seterus, Inc. as the authorized subservicer for Federal National
 Mortgage Association ("Fannie Mae"), creditor c/o Seterus, Inc.*

9 UNITED STATES BANKRUPTCY COURT
 10 DISTRICT OF NEVADA

11 In re:

Case No.: 13-52342-btb
 Chapter: 13

12 SUSY J VALDESPIN
 13 *aka SUSY J CORONADO*
 14 *aka SUSY J CORONADOORELLANA*
 15 *aka JORGE VALDESPIN*
 16 *aka SUSY J VALENCIA*

STIPULATION REGARDING
 ADEQUATE PROTECTION
 PAYMENTS

Debtor.

17 The parties hereby having reached an agreement and for good cause appearing;

18 IT IS HEREBY STIPULATED between Seterus, Inc. as the authorized subservicer for
 19 Federal National Mortgage Association ("Fannie Mae"), creditor, c/o Seterus, Inc. ("Secured
 20 Creditor"), by and through its counsel of record, Raymond Jereza, Esq. of Wright, Finlay & Zak,
 21 LLP and Debtor, Susy J Valdespin, by and through her counsel of record, Kerry J. Eaton, Esq.,
 22 that the stay in regards to the real property located at 9345 Stoney Creek Way, Reno, NV 89506,
 23 shall remain in effect subject to the following terms and conditions:

24 Debtor currently owes post-petition arrears to Secured Creditor as follows:

25 Payment: 2/01/14 @ \$898.10 per month	\$898.10
26 Payments: 3/01/14-09/01/14 @ \$968.72 per month	\$6,781.04
Property Inspection Fees	\$165.00
27 Suspense Balance	(\$70.10)
28 Total	\$7,774.04

1 Debtor is post-petition delinquent in the total amount of \$7,774.04. Debtor shall make
2 equal monthly adequate protection installments in the amount of \$863.78 for eight (8) months
3 commencing October 15, 2014 and continuing on the fifteenth day of each month ending
4 May 15, 2015, followed by a payment of \$863.80 on June 15, 2015, in order to cure the post-
5 petition default. All payments due to Secured Creditor set forth shall be paid to Seterus, Inc. at
6 the following address in the form of certified funds:

7 Seterus, Inc.
8 PO Box 7162
9 Pasadena, CA 91109-7162

10 IT IS FURTHER STIPULATED that, in addition to the aforementioned adequate
11 protection payments, the Debtor shall remain current and in good standing on her regular
12 mortgage payments in the amount of \$968.72 per month (\$734.44 in principal and interest plus
13 \$234.28 in taxes and insurance), which are due on the first of each month. The amount of these
14 payments may be subject to change under terms of the parties' original agreements. Debtor's
15 next post-petition payment is due for October 1, 2014, in the amount of \$968.72.

16 IT IS FURTHER STIPULATED that upon any default in the foregoing terms and
17 conditions, Secured Creditor shall serve written notice of default to Debtor, and any attorney for
18 Debtor. If Debtor fails to cure the default within 15 calendar days after mailing of such written
19 notice:

- 20 a. Secured Creditor may file and serve a declaration under penalty of perjury specifying
21 the default, together with a proposed order terminating stay, which the Court may
22 grant without further notice of hearing.
23 b. Secured Creditor may move for relief from the stay upon shortened notice in
24 accordance with Local Bankruptcy Rules.
25 c. Secured Creditor may move for relief from the stay on regular notice.

26 IT IS FURTHER STIPULATED that the stay shall remain in effect subject to the terms
27 and conditions set forth in the Stipulation for Adequate Protection Payments.
28

1 IT IS FURTHER STIPULATED that this Stipulation shall be binding and effective
2 despite any conversion of this bankruptcy case to a case under any other chapter of Title 11 of
3 the United States Code.

4
5 Submitted by:

6 WRIGHT, FINLAY & ZAK, LLP

7 
8 _____
Raymond Jereza, Esq.

Dated: 10/13/14

9 Nevada Bar No. 011823

10 5532 South Fort Apache Road, Suite 110

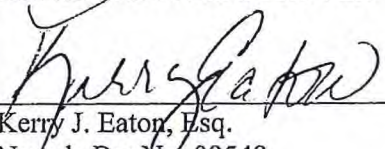
11 Las Vegas, NV 89148

12 *Seterus, Inc. as the authorized subservicer for*

Federal National Mortgage Association

("Fannie Mae"), creditor, c/o Seterus, Inc.

13
14 APPROVED / DISAPPROVED

15 
16 _____
Kerry J. Eaton, Esq.

Dated: 9/10/14

17 Nevada Bar No. 09548

18 5421 Kietzke Ln, Ste 100

19 Reno, NV 89511

20 *Attorney for Debtor*